

**UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
PENNSYLVANIA**

**GK Parandhamaia  
Plaintiff**

**CIVIL DIVISION**

**VS.**

**NO. \_\_\_\_\_**

**Jeffrey Scott Hofius  
And Kari Verroco  
Defendants**

**COMPLAINT**

**Filed on Behalf of Plaintiff:**

**Attorney of Record for this Party:**

**Robert L. Allen, Esquire  
Pa. I.D. 84138**

**25254 Garrett Highway  
Suite B  
McHenry, MD 21541**

**(301) 387-2800**

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**GK Parandhamaia  
Plaintiff**

**CIVIL DIVISION**

**VS.**

**NO. \_\_\_\_\_**

**Jeffrey Scott Hofius  
And Kari Verroco  
Defendants.**

**JURY TRIAL DEMANDED**

**COMPLAINT**

1. This is a civil action seeking monetary damages against Defendants for committing acts or omissions of negligence against Plaintiff.

**JURISDICTION**

2. Plaintiff is a citizen of the State of Maryland and defendant, Jeffrey Scott Hofius is a citizen of the State of Pennsylvania. The matter in controversy exceeds, exclusive of interest and costs, the sum of \$ 75,000.
3. The Court has jurisdiction under 28 U.S.C. §1332.
4. The Court also has pendant jurisdiction as provided under 28 U.S.C. §1367(a).

**PARTIES**

5. Plaintiffs, GK Parandhamia is citizen and resident of Swanton, Maryland and the United States of America.

6. Defendant, Jeffrey Scott Hofius, at all times relevant hereto, is a citizen of Sharpsville, Pennsylvania.

7. Defendant, Kari A Verroco, at all times relevant hereto, is a citizen of Sharpsville, Pennsylvania.

8. Plaintiffs sues Defendant, Jeffrey Scott Hofius, in his individual capacity.

9. Plaintiffs sues defendant, Kari A Verroco in her individual capacity as owner of the vehicle driven by Jeffrey Scott Hofius.

**COUNT I – NEGLIGENCE Jeffrey Scott Hofius,**

1. - 9. Plaintiff repeats and re-alleges and incorporates by reference the allegations contained in paragraphs 1. through 7. above with the same force and effect as if herein set forth.

10. On or about November 3, 2012, the Plaintiff, was operating a motor vehicle, to-wit: 2003 Subaru Legacy, which he had stopped at the yield sign waiting to merge East onto East State Street along the Shenango Valley Freeway, in Mercer county, Pennsylvania.

11. At said time and place, the Defendant, Jeffrey Scott Hofius, was the driver of another automobile, to-wit: 2002 Honda civic, that was owned by Defendant, Kari A Verroco.

12. At said time and place, the Defendant, Jeffrey Scott Hofius, with the permission of Kari Verroco was operating her vehicle.

13. On or about November 3, 2012, the Defendant, Jeffrey Scott Hofius, individually with permission of Defendant, Kari Verroco, was operating a said 2002 Honda civic vehicle in a similar direction as the Plaintiff GK Parandhamia.

14. At this time and place, it became and was the duty of the Defendant, Jeffrey Scott Hofius, to exercise due care and caution in the operation of his motor vehicle having due regard for the traffic and use of the roadway.

15. At this time and place, the Plaintiff, GK Parandhamia, was driving with due care and caution, along and upon the roadway, as aforesaid.

16. At this time and place, the Defendant, Jeffrey Scott Hofius, negligently drove his automobile into the rear of Plaintiff's vehicle causing a collision.

17. The Defendant, Jeffrey Scott Hofius, was then and there guilty of one or more of the following negligent acts or omissions:

- a. Negligently and carelessly operated his motor vehicle without due regard for other vehicles rightfully and lawfully along the way;
- b. Negligently and carelessly operated his motor vehicle at a high and dangerous rate of speed;
- c. Negligently and carelessly operated his motor vehicle without sufficient control for conditions prevailing along said street;

- d. Failed to stop his motor vehicle in time to avoid a collision, although a collision was imminent, and where he had ample time and opportunity to avoid it;
- e. Negligently drove his motor vehicle without sufficient brakes; or in the alternative, if such brakes were adequate, negligently failed to apply such brakes so as to control the speed of her vehicle and to avoid the aforesaid collision;
- f. Drove his motor vehicle too fast and in such a manner that operation became dangerous, for the prevailing weather and road conditions;
- g. Drove his motor vehicle in disregard of the prevailing road, weather and traffic conditions, so as to constitute a driving hazard;
- h. Failed to keep a proper lookout for other vehicles along the roadway
- i. Was operating the vehicle under the influence of alcohol
- j. Was driving while intoxicated;

18. The defendant's conduct was severe and outrageous with reckless indifference to the interests of others.

19. As a direct and proximate result of one or more of these aforesaid negligent acts or omissions, the Defendant's vehicle collided with the Plaintiff's vehicle causing the Plaintiff to be thrown about the inside of her car whereby the Plaintiff sustained great and severe personal injuries. These injuries caused the Plaintiff to experience great pain and suffering and caused the Plaintiff to become disabled. The Plaintiff was caused to expend considerable sums of money for necessary medical care and attention and may be liable for future medical expense for these injuries. These

injuries rendered the Plaintiff disabled and unable to perform her daily work and affairs whereby the Plaintiff sustained the loss of great gains and profits. The Plaintiff also sustained the loss of his enjoyment of a normal life. Plaintiff's injuries are of a permanent nature.

WHEREFORE, the Plaintiff, GK Parandhamia, prays for damages against the Defendant, Jeffrey Scott Hofius, individually in a sum of money in excess of the jurisdictional amount of Seventy-Five Thousand Dollars (\$ 75,000.00) including punitive damages plus his costs of this action and any other such other relief to be deemed just and equitable.

### **COUNT II – Negligent Entrustment**

1.- 19. Plaintiff repeats and re-alleges and incorporates by reference the allegations contained in paragraphs 1. through 19. above with the same force and effect as if herein set forth.

20. On or about November 3, 2012 and at the time of the collision with Plaintiff as heretofore described, Defendant, Jeffrey Scott Hofius was acting with the permission of Kari Verroco.

21. On or about November 3, 2012, and at the time of the collision with Plaintiff as heretofore described, Defendant Kari Verroco knew or should have known the Defendant, Jeffrey Scott Hofius was under the influence and or intoxicated with alcohol.

22. At said time and place, and at the time of the collision with Plaintiff as heretofore described, the Defendant, Jeffrey Scott Hofius, was the permissive driver of the 2002 Honda Civic, that was owned by Defendant, Kari Verroco.

23. As a direct and proximate result of one or more of these aforesaid negligent acts or omissions, the Defendant's vehicle violently collided with the Plaintiff's vehicle causing the Plaintiff to be thrown about the inside of her car whereby the Plaintiff sustained great and severe personal injuries. These injuries caused the Plaintiff to experience great pain and suffering and caused the Plaintiff to become disabled. The Plaintiff was caused to expend considerable sums of money for necessary medical care and attention and may be liable for future medical expense for these injuries. These injuries rendered the Plaintiff disabled and unable to perform her daily work and affairs whereby the Plaintiff sustained the loss of great gains and profits. The Plaintiff also sustained the loss of his enjoyment of a normal life. Plaintiff's injuries are of a permanent nature.

WHEREFORE, the Plaintiff, GK Parandhamia, prays for damages against the Defendant, Kari Verroco, based her negligent acts a sum of money in excess of the jurisdictional amount of Seventy-Five Thousand Dollars (\$ 75,000.00) plus her costs of this action and any other such other relief to be deemed just and equitable.

Respectfully Submitted,  
/s/ electronically signed by  
Robert L. Allen, Esquire  
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